

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

Isabela Sneed,)	
)	
Plaintiff,)	
)	
v.)	Case No. 22-cv-00031-R
)	
Independent School District No. 16 of)	
Payne County,)	
)	
Defendant.)	

PLAINTIFF’S FIRST AMENDED WITNESS LIST

COMES NOW the Plaintiff, Isabela Sneed (“Plaintiff”), and submits the following Amended Witness List:¹

Name	Subject of Information
Isabela Sneed c/o Daniel E. Smolen Robert M. Blakemore SMOLEN & ROYTMAN 701 South Cincinnati Avenue Tulsa, Oklahoma 74119	She will testify as to events relevant to the allegations in the Complaint, including liability and damages.
Heather Sneed c/o MOORE-SHRIER LAW FIRM 624 S. Boston Ave., Ste. 1070 Tulsa, Oklahoma 74119 Voice: 918-592-3001 Fax: 918-794-7149	Plaintiff’s mother. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages.
Harry Sneed c/o MOORE-SHRIER LAW FIRM 624 S. Boston Ave., Ste. 1070 Tulsa, Oklahoma 74119	Plaintiff’s father. Has knowledge of events relevant to the allegations in the Complaint, including liability and damages.

¹ This Witness List is submitted while discovery is ongoing. Plaintiff reserves the right to amend this Witness List as new information becomes available through the discovery process.

Voice: 918-592-3001 Fax: 918-794-7149	
Brian Warwick c/o John E. Priddy, 525 South Main, Suite 700 Tulsa, OK 74103 Telephone: (918) 585-9211 Facsimile: (918) 583-5617	Former Assistant Principal of Stillwater Junior High. Current Athletic Director for SPS. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages. Policies, customs and practices of SPS.
John Fields 1615 W UNIVERSITY AVE STILLWATER, OK 74074 405-372-3019	Former Principal of Stillwater Junior High. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages. Policies, customs and practices of SPS.
Uwe Gordon c/o John E. Priddy, 525 South Main, Suite 700 Tulsa, OK 74103 Telephone: (918) 585-9211 Facsimile: (918) 583-5617	High School Principal. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages. Policies, customs and practices of SPS.
Seth Condley c/o John E. Priddy, 525 South Main, Suite 700 Tulsa, OK 74103 Telephone: (918) 585-9211 Facsimile: (918) 583-5617	Soccer coach. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages. Policies, customs and practices of SPS.
Victor R. Gonzalez 1721 E LINDA AVE STILLWATER, OK 74075 832-876-0176	Former ELL Teacher. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages. Policies, customs and practices of SPS.
Alberto Morejon John Lilley Correctional Facility 407971 Highway 62E Boley, OK 74829	Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages. Policies, customs and practices of SPS.
N.M. [Contact Info is Confidential]	Second victim of Morejon who was subject of a second criminal matter.
Sherae LeJeune Stillwater Police Department 723 S. Lewis St. Stillwater, OK 74074	Investigation into allegations against Morejon. Criminal charges against Morejon.

<p>“Officer Gibbs” Stillwater Police Department 723 S. Lewis St. Stillwater, OK 74074</p>	<p>Investigation into allegations against Morejon. Criminal charges against Morejon.</p>
<p>Kyle Liechti c/o John E. Priddy, 525 South Main, Suite 700 Tulsa, OK 74103 Telephone: (918) 585-9211 Facsimile: (918) 583-5617</p>	<p>Volleyball coach. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages. Policies, customs and practices of SPS.</p>
<p>Kristin Janloo c/o John E. Priddy, 525 South Main, Suite 700 Tulsa, OK 74103 Telephone: (918) 585-9211 Facsimile: (918) 583-5617</p>	<p>Computers and journalism teacher. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages. Policies, customs and practices of SPS.</p>
<p>Saul Talley c/o John E. Priddy, 525 South Main, Suite 700 Tulsa, OK 74103 Telephone: (918) 585-9211 Facsimile: (918) 583-5617</p>	<p>Social Studies teacher. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages. Policies, customs and practices of SPS.</p>
<p>Carl Nipper c/o John E. Priddy, 525 South Main, Suite 700 Tulsa, OK 74103 Telephone: (918) 585-9211 Facsimile: (918) 583-5617</p>	<p>FFA. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages. Policies, customs and practices of SPS.</p>
<p>Shandi Treat c/o John E. Priddy, 525 South Main, Suite 700 Tulsa, OK 74103 Telephone: (918) 585-9211 Facsimile: (918) 583-561</p>	<p>Former Assistance Principal at Stillwater Junior High. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages. Policies, customs and practices of SPS.</p>
<p>Bailey Kliewer c/o John E. Priddy, 525 South Main, Suite 700 Tulsa, OK 74103</p>	<p>FFA. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages. Policies, customs and practices of SPS.</p>

Telephone: (918) 585-9211 Facsimile: (918) 583-561	
Avery Blakey 1224 N Husband St Stillwater, OK 74075	Student. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages.
Blake Crowson 4207 EDEN CHAPEL LN, STILLWATER, OK 74074	Student. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages.
Kyra Shores 205 SW 2ND ST. PERKINS, OK 74059	Student. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages.
Jackson Gardner 1114 CHANDLER ST. STILLWATER, OK 74074	Student. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages.
Avery Bassett 2624 S BLACK OAK DR. STILLWATER, OK 74074	Student. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages.
Nolan Morgan 2502 N MONROE ST. STILLWATER, OK 74075	Student. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages.
Jaycie Jackson 17400 EXPLORER PERRY, OK 73077	Student. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages.
Garrett Perry 1224 N Husband St Stillwater, OK 74075	Student. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages.
Anna Thompson 1224 N Husband St Stillwater, OK 74075	Student. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages.
Miana Smith 1501 W 3RD AVE APT 14 STILLWATER, OK 74074	Student. Has knowledge of matters relevant to the allegations in the Complaint, including liability and

	damages.
MORGANNE E MOREJON aka Morganne E Hiatt 601 DOGWOOD CT CLEVELAND, OK 74020 Phone Number(s): 918-619-2224 405-630-0673 918-231-6742	Morejon's ex-wife. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages.
Jeremy Hooten c/o John E. Priddy, 525 South Main, Suite 700 Tulsa, OK 74103 Telephone: (918) 585-9211 Facsimile: (918) 583-561	School Resource Officer. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages. Policies, customs and practices of SPS.
Walter Howell c/o John E. Priddy, 525 South Main, Suite 700 Tulsa, OK 74103 Telephone: (918) 585-9211 Facsimile: (918) 583-561	Assistant Principal. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages. Policies, customs and practices of SPS.
Kendra Kilpatrick 2216 N FAIRLAKE DR, STILLWATER, OK 74075-3002	Former Basketball Coach and Teacher. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages. Policies, customs and practices of SPS.
Lindy Zamborsky c/o John E. Priddy, 525 South Main, Suite 700 Tulsa, OK 74103 Telephone: (918) 585-9211 Facsimile: (918) 583-561	Counselor. Has knowledge of matters relevant to the allegations in the Complaint, including liability and damages. Policies, customs and practices of SPS.
Joy Coffman, LPC Coffman Wellness, LLC 8516 E 101st St. Tulsa, OK 74133 Phone: (918) 928-5535	Counseling and mental health care provided to Plaintiff in connection with abuse of Morejon. Plaintiff's mental health, injuries and damages.
Kelly Griffith, Ph.D. 1024 W Lakeridge Ave Stillwater OK, 74075	Counseling and mental health care provided to Plaintiff in connection with abuse of Morejon. Plaintiff's mental health, injuries and damages.

Mary Melton, LPC 1601 S Main St. Stillwater, OK 74074 Phone: (405) 372-2300	Counseling and mental health care provided to Plaintiff in connection with abuse of Morejon. Plaintiff's mental health, injuries and damages.
Krystal Voight, M.D. 1201 S Adams St, Stillwater, OK 74074 Phone: (405) 743-7375	Counseling and mental health care provided to Plaintiff in connection with abuse of Morejon. Plaintiff's mental health, injuries and damages.
Jared Brisbin 360410 East 5500 Road Hallett, OK 74034	Morejon's Stepfather. Can testify concerning admissions of misconduct made by Morejon.

Plaintiff reserves the right to supplement this witness list. Plaintiff also reserves the right to call witnesses for impeachment and/or rebuttal purposes.

Plaintiff further reserves the right to call witnesses endorsed by Defendants to which Plaintiff does not object.

At this time, Plaintiff does not anticipate presenting any witness' testimony by means of his or her deposition.

Respectfully submitted,

SMOLEN & ROYTMAN

/s/ Robert M. Blakemore
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-and-

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of November 2022, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrants who have appeared in this case.

/s/ Robert M. Blakemore